

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

1) VIDEO GAMING TECHNOLOGIES, INC.,)	
)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:17-cv-00454-GKF-JFJ
)	
1) CASTLE HILL STUDIOS LLC)	
(d/b/a CASTLE HILL GAMING);)	
2) CASTLE HILL HOLDING LLC)	
(d/b/a CASTLE HILL GAMING); and)	
3) IRONWORKS DEVELOPMENT, LLC)	
(d/b/a CASTLE HILL GAMING))	
)	
Defendants.)	

PLAINTIFF’S PRETRIAL DISCLOSURES

Pursuant to Federal Rule of Civil Procedure 26(a)(3) and the Court’s Scheduling Order, Dkt. 312, Plaintiff Video Gaming Technologies, Inc. (“VGT”) hereby submits the following Pretrial Disclosures, stating as follows regarding the evidence that it may present at trial other than solely for impeachment:

(i) The name and, if not previously provided, address and telephone number of each witness—separately identifying those VGT expects to present and those VGT may call if the need arises:

Witnesses VGT expects to present:

No.	Name	Address & Telephone Number
1.	Josh Akins	Current VGT employee / may be contacted through counsel of record
2.	Steven Archey	Current VGT employee / may be contacted through counsel of record
3.	Melissa Bennis	VGT expert witness / may be contacted through counsel of record
4.	Josh Davis	Current VGT employee / may be contacted through counsel of record

No.	Name	Address & Telephone Number
5.	Betsy Dickinson	Current Aristocrat employee / may be contacted through counsel of record
6.	Craig Eubanks	Current VGT employee / may be contacted through counsel of record
7.	Stacy Friedman	VGT expert witness / may be contacted through counsel of record
8.	Tracer Hamilton	909 Desert Trl., Yukon, OK 73099 (405) 365-1750
9.	Constance Hollingsworth	9585 Celia Berryhill Road, Okmulgee, OK 74447 (918) 752-8396
10.	James Marcum	Current VGT employee / may be contacted through counsel of record
11.	David Marsh	Current Aristocrat employee / may be contacted through counsel of record
12.	Ryan North	Current Aristocrat employee / may be contacted through counsel of record
13.	Rich Schneider	Current Aristocrat employee / may be contacted through counsel of record
14.	Robert Schramer	Current VGT employee / may be contacted through counsel of record
15.	Jay Seigny	10233 Spring Green Drive, Englewood, Colorado 80112 (615) 587-0008
16.	Richard Sisson	CHG employee
17.	Jason Sprinkle	CHG employee
18.	James Starr	Current VGT employee / may be contacted through counsel of record
19.	Sheldon Watkins	Current VGT employee / may be contacted through counsel of record
20.	Yoram (Jerry) Wind	VGT expert witness / may be contacted through counsel of record

Witnesses VGT may call if the need arises:

No.	Name	Address & Telephone Number
1.	James Berger	CHG expert witness
2.	Brandon Booker	CHG employee
3.	Sarah Carlson	15 Clover Lane, Deer Park, Illinois 60010 (847) 687-4407
4.	Daniel Fulton	CHG employee
5.	Joshua Larson	CHG employee
6.	Aaron Milligan	CHG employee
7.	Seth Morgan	CHG employee
8.	Alan Roireau	CHG employee
9.	Andrew Scheiner	CHG employee

No.	Name	Address & Telephone Number
10.	Zachary Schmid	644 Carroll Square, Apt. 1N, Elk Grove Village, IL 60007 (515) 451-4154
11.	Chris Shults	16286 E 79 Street N, Owasso, OK 74055 (918) 713-2024
12.	Paul Suggs	CHG employee
13.	John Taylor	3227 Heathcote Lane, Keswick, Virginia 22947 (434) 979-1357
14.	Zachary Trover	CHG employee
15.	Joseph Valandra	CHG expert witness
16.	Arthur Watson	CHG employee
17.	George Weilacher	CHG employee
18.	Richard Williamson	Current VGT employee / may be contacted through counsel of record

(ii) The designation of those witnesses whose testimony the party expects to present by deposition and, if not taken stenographically, a transcript of the pertinent parts of the deposition:

No.	Name
1.	James Berger
2.	Brandon Booker
3.	Sarah Carlson
4.	Daniel Fulton (May 31, 2018)
5.	Daniel Fulton (August 1, 2018)
6.	Joshua Larson
7.	Aaron Milligan
8.	Seth Morgan
9.	Alan Roireau (May 15, 2018)
10.	Alan Roireau (August 1, 2018)
11.	Andrew Scheiner
12.	Zachary Schmid
13.	Richard Sisson (April 17, 2018)
14.	Richard Sisson (August 2, 2018)
15.	Jason Sprinkle (May 18, 2018)
16.	Jason Sprinkle (July 11, 2018)
17.	Paul Suggs
18.	John Taylor
19.	Zachary Trover
20.	Joseph Valandra
21.	Arthur Watson (July 12, 2018)
22.	Arthur Watson (August 2, 2018)
23.	George Weilacher

No.	Name
24.	John Yarbrough

See Dkt. 342 (VGT Designations). To the extent that CHG presents deposition testimony for any witness, *see* Dkt. 343 (CHG Designations), VGT would present corresponding counter-designated deposition testimony for that witness, *see* Dkt. 346 (VGT Counter-Designations).

Pursuant to the Court’s Scheduling Order and Local Rule 30.1(c), VGT and CHG submitted transcripts of the pertinent parts of designated depositions to the Court Clerk, and exchanged electronic copies between the Parties, on August 15, 2019.

(iii) An identification of each document or other exhibit, including summaries of other evidence—separately identifying those items the party expects to offer and those it may offer if the need arises:

The documents and exhibits that VGT expects to offer and may offer if the need arises are listed in the attached Exhibit A.

August 19, 2019

Respectfully submitted,

/s/ Gary M. Rubman
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Counsel for Video Gaming Technologies, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on August 19, 2019, I filed the foregoing Plaintiff's Pretrial Disclosures via ECF, which caused a true and correct copy of the foregoing motion to be delivered to the following counsel:

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